

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

This Document Relates To All Cases

MDL No. 3:16-md-02738-MAS-RLS

**[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION TO
EXCLUDE PLAINTIFFS'
EXPERTS' ASBESTOS-RELATED
OPINIONS**

THIS MATTER having been brought before the Court by Defendants Johnson & Johnson and LLT Management, LLC for an order that excludes Plaintiffs' experts' opinions regarding the alleged presence of asbestos in Defendants' talcum powder; and for good cause shown;

IT IS on this _____ day of _____, 2024
hereby **ORDERED** that Defendants' Motion to Exclude Plaintiffs' Experts' Asbestos-Related Opinions is hereby **GRANTED**. It is hereby further **ORDERED** that:

1. Dr. Longo's polarized light microscopy testing for the presence of chrysotile asbestos is excluded;
2. Dr. Longo and Dr. Rigler's transmission electron microscopy testing for the presence of amphibole asbestos is excluded;
3. Plaintiffs' experts' opinion that asbestos causes ovarian cancer is excluded;

4. Dr. Cook and Dr. Krekeler's opinion that the talc ore is contaminated with asbestos is excluded; and
5. Plaintiffs' experts' opinion that "fibrous talc" causes ovarian cancer is excluded.

Hon. Michael A. Shipp, U.S.D.J.